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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST COMPANY, FORMERLY KNOWN AS BANKERS TRUST COMPANY OF CALIFORNIA, N.A., AS TRUSTEE FOR AMERICAN HOME MORTGAGE ASSETS TRUST 2006-1.

Plaintiff.

vs.

THUNDER PROPERTIES INC.;  
EDGEWATER HOMEOWNERS  
ASSOCIATION; KERN & ASSOCIATES,  
LTD.; DOE INDIVIDUALS I through X,  
inclusive; and ROE CORPORATIONS XI  
through XX, inclusive.

## Defendants.

Case No.: 3:16-cv-00381-MMD-WGC

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR PLAINTIFF  
TO FILE ITS RESPONSES TO  
EDGEWATER HOMEOWNERS  
ASSOCIATION'S MOTION TO  
DISMISS AND MOTION FOR  
SUMMARY JUDGMENT**

## [FIRST REQUEST]

COMES NOW Plaintiff, DEUTSCHE BANK NATIONAL TRUST COMPANY, FORMERLY KNOWN AS BANKERS TRUST COMPANY OF CALIFORNIA, N.A., AS TRUSTEE FOR AMERICAN HOME MORTGAGE ASSETS TRUST 2006-1 (“Deutsche Bank”), and Defendant, EDGEWATER HOMEOWNERS ASSOCIATION (“HOA”) by and through their undersigned counsels, and hereby jointly submit the following Stipulation to extend

1 time for Deutsche Bank to file its Responses to HOA's Motion to Dismiss [ECF No. 20] and  
2 HOA's Motion to Dismiss/Motion for Summary Judgment [ECF No. 23].

3 1. Deutsche Bank filed its Complaint commencing the instant action on June 27,  
4 2016 [ECF No. 1].

5 2. Deutsche Bank filed its First Amended Complaint on September 27, 2017 [ECF  
6 No. 16].

7 3. On October 24, 2017, HOA filed its Motion to Dismiss Claims by Deutsche Bank  
8 in its First Amended Complaint [ECF No. 20], a Response to which is currently due to be filed  
9 by November 14, 2017.

10 4. On October 25, 2017, HOA filed its Motion to Dismiss/Motion for Summary  
11 Judgment Claims by Deutsche Bank in its First Amended Complaint [ECF No. 23], a Response  
12 to which is currently due to be filed by November 8, 2017.

13 5. As the HOA's Motions referenced above are identical, Deutsche Bank intends to  
14 file identical Responses to both Motions.

15 6. Deutsche Bank counsel reached out and obtained consent from counsel for HOA  
16 to allow Deutsche Bank up to and including November 17, 2017 to file its Responses.

17 7. The Parties further agree that HOA may have up to and including December 4,  
18 2017 to file its Replies in support of the above Motions.

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8. This is the Parties' first request for an extension and is not intended to cause any undue delay or prejudice to any party in this action.

Respectfully submitted this 8<sup>th</sup> day of November, 2017.

**WRIGHT, FINLAY & ZAK, LLP**  
*Attorneys for Plaintiff*

**LIPSON, NEILSON, COLE,  
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Attorneys for  
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## ORDER

IT IS SO ORDERED.

DATED: November 9, 2017



UNITED STATES DISTRICT JUDGE